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8
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JONI M. COSTELLO, individually;

12 Plaintiff,

13 vs.

14 DEMOCRACY PREP AGASSI CAMPUS, a
Nevada Non-Profit Corporation; Does
15 1through 100; and ROE ENTITIES A through
Z, inclusive;

16 Defendants.
17

Case No. 2:17-cv-02491-JAD-VCF

**STIPULATION TO EXTEND DUE DATE
FOR RESPONSIVE PLEADING TO
AMENDED COMPLAINT**

(First Request)

18 Plaintiff Joni M. Costello ("Plaintiff") and Defendant Democracy Prep Agassi Campus
19 ("Defendant"), by and through their respective counsels of record, submit this stipulation to extend
20 the due date for Defendant's responsive pleading to Plaintiff's First Amended Complaint from
21 December 26, 2017 to January 5, 2018.

22 **BACKGROUND**

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24 Defendant's counsel, Elayna J. Youchah, was recently asked to assist in the representation
25 of Defendant in the above captioned matter. Ms. Youchah's calendar for the period between
26 December 11, 2017 and the end of the year is extraordinarily busy and includes attendance at Early
27 Neutral Evaluations, assistance with the preparation for trial scheduled in federal court on a two
28

1 week stack, with calendar call set for January 2, 2018, and additional matters requiring filings in
2 this Court as well as in state court. For this reason, Defendant's seek an eight (8) work day
3 extension of the due date for the responsive pleading.

4 **STIPULATION**

5 NOW THEREFORE, the parties hereby agree and stipulate as follows:

6 The deadline for Defendant to file its responsive pleading shall be extended from December
7 26, 2017 to January 5, 2018.

8 DATED this 12th day of December 2017.

9 JACKSON LEWIS P.C.

10 /s/ Elayna J. Youchah

11 Elayna J. Youchah, Bar No. 5837

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18 /s/ Paul S. Padda

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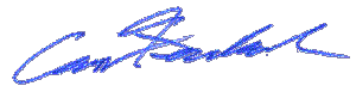
22 Las Vegas, Nevada 89103

23 *Attorneys for Plaintiff*

24 *Joni M. Costello*

25 **ORDER**

26 **IT IS SO ORDERED.**

27 

28 UNITED STATES MAGISTRATE JUDGE

DATED: December 12, 2017